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*Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

DAVID WOODRING,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC., EQUIFAX INFORMATION SERVICES,  
LLC, NAVIENT, and NEW YORK STATE  
BOARD OF HIGHER EDUCATION,

Defendants.

Case No. 2:19-cv-00030-JAD-VCF

**STIPULATION AND ORDER  
EXTENDING DEADLINE FOR NAVIENT  
TO FILE AN ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiff DAVID WOODRING ("Plaintiff") and Defendant NAVIENT SOLUTIONS, LLC, incorrectly named NAVIENT in the Complaint, by and through their respective counsel, stipulate and agree to extend the deadline from January 30, 2019 to February 22, 2019, for Defendant NAVIENT SOLUTIONS, LLC ("NSL"), to File an Answer or Otherwise Respond to Plaintiff's Complaint (ECF No. 1.).

On January 4, 2019, Plaintiff filed his Complaint. The claims at issue necessitate additional time for fact-finding. Further, NSL is in the process of acquiring and reviewing all relevant documents so that it can meaningfully respond to the specific allegations contained in Plaintiff's Complaint. Moreover, undersigned counsel was just retained by NSL to defend it in this action, and therefore requires additional time to investigate the allegations and claims asserted against NSL. Plaintiff has no opposition to NSL's request for an extension until February 22, 2019 to file an answer or otherwise respond to Plaintiff's Complaint. NSL agrees to participate in a 26(f) conference if one is scheduled and coordinated with NSL during the pendency of the extension.

1 This is the first stipulation for extension of time for NSL to respond to Plaintiff's Complaint  
2 and is being made in good faith and not for purposes of undue delay. No additional requests for  
3 extensions are contemplated.

4 **IT IS SO STIPULATED.**

5 Dated this 28th day of January, 2019.

6 **HOLLEY, DRIGGS, WALCH, FINE,**  
7 **WRAY, PUZEY & THOMPSON**

8 /s/ Michael R. Ayers  
9 JAMES W. PUZEY, ESQ.  
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13 Reno, Nevada 89521  
14 *Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

15 Dated this 28th day of January, 2019.

16 **KNEPPER & CLARK LLC**

17 /s/ Miles Clark  
18 MILES CLARK, ESQ.  
19 10040 W. Cheyenne Avenue  
20 Suite 170-109  
21 Las Vegas, Nevada 89129  
22 *Attorneys for Plaintiff*

23 **ORDER**

24 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up  
25 to and including February 22, 2019 is so ORDERED AND ADJUDGED.

26 Dated this 28th day of January, 2019.

27   
28 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28th day of January, 2019, I served a copy of the foregoing  
**STIPULATION AND ORDER EXTENDING DEADLINE FOR NAVIENT TO FILE AN  
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** upon the party  
below via electronic service through the United States District Court for the District of Nevada's  
ECF system:

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By: /s/ SUSAN M. MATEJKO  
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